

# **Exhibit 1**



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21  
22  
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25  
ALSO PRESENT:  
PETER COOPER, ESQ., Google  
SHAWN BUDD, Videographer

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1

U. ROWE

2

Q. Other opportunities, and are those other job opportunities that you sought and did not get?

5

A. There was at least one of those.

7

Q. And when was that?

8

A. So the denied promotion was the VP of financial services, and later I raised my hand for a VP of sales role in financial services, the head of financial services and sales, that was the role.

13

Q. So the first one is the financial services vertical head job, correct?

16

A. Correct, VP of -- yes.

17

Q. And that was the job that you claim was given to Stuart Breslow, right?

19

A. Correct.

20

Q. Just to make sure we're talking about the same thing, okay. Tell me again, what was the second opportunity that you were denied?

24

A. I raised my hand for the VP of financial services role and sales.

1 U. ROWE

2 Q. And when was that?

3 A. I don't remember the exact  
4 timing, but I think it was earlier this  
5 year.

6 Q. So you think sometime in 2020,  
7 early 2020?

8 A. Yes.

9 Q. Before or after the pandemic  
10 shut down the country, can you place it  
11 that way?

12 A. Before.

13 Q. Before, okay, so sometime  
14 before the middle of March, is that fair to  
15 say?

16 A. Yes.

17 Q. And was that a job that was  
18 posted internally at Google?

19 A. I don't know if there was a job  
20 posting. I didn't see a posting.

21 Q. We will come back to that.  
22 But I want to go back to the  
23 second item that you mentioned, and that is  
24 you said that you were discriminated  
25 against on a day-to-day basis. So on that

1 U. ROWE

2 Google?

3 A. I have not.

4 Q. Have you ever been through the  
5 leveling process at Google, as a  
6 participant in the process of leveling  
7 someone?

8 A. I have not.

9 Q. Have you ever participated in a  
10 hiring committee?

11 A. I have not.

12 Q. Have you ever participated in  
13 any way in the decision-making process that  
14 leads to the leveling of someone at hire at  
15 Google?

16 A. I have done a lot of  
17 interviews, but no, I have not specifically  
18 been involved in leveling discussions, no.

19 Q. And in any of those interviews,  
20 were you asked to offer an opinion as to  
21 the level that someone was supposed to --  
22 that someone might get?

23 A. I have not.

24 Q. You indicated earlier in your  
25 testimony that there was another

1 U. ROWE  
2 opportunity, VP, financial services and  
3 sales, that you applied for in 2020. Do  
4 you recall that testimony?

5 A. I raised my hand for it.

6 Q. What do you mean when you say  
7 you raised your hand for it?

8 A. I expressed interest in it.

9 Q. And how did you express  
10 interest in it?

11           A.        I heard from **REDACTED** and I'm  
12 completely blanking on her last name,  
13 **REDACTED** runs sales for U.S., and I had -- I  
14 had a one-on-one with her, and she  
15 mentioned that she was thinking of hiring a  
16 VP of sales for financial services, and I  
17 told her that I would be interested.

18 Q. And what, if anything, happened  
19 next in connection with your interest in  
20 that job?

21 A. So she asked me to reach out to  
22 HR, so I reached out to HR.

23 Q. Who did you reach out to in HR?

24 A. I think it was Stuart Weidman,  
25 I'm not 100 percent sure.

1 U. ROWE

2 Q. What happened next?

3 A. He said that he would talk to  
4 **REDACTED** and come back to me.

5 Q. And did he?

6 A. He did.

7 Q. And what happened next?

8 A. He said that based on the  
9 conversations with **REDACTED** that they  
10 weren't going to go ahead with me.

11 Q. Did he tell you anything more,  
12 did he give you any more details?

13 A. I don't remember a lot of the  
14 details, but I was surprised when he said  
15 based on your interview with **REDACTED** I did  
16 not have an interview with **REDACTED** this  
17 was like a casual one-on-one get-together,  
18 I found out about the opportunity during  
19 that meeting, and that, you know, he told  
20 me that based on that conversation that I  
21 was being discounted, I was surprised.

22 Q. And was that the end of it?

23 A. Yes.

24 Q. Did you ever follow up with  
25 **REDACTED**



1 U. ROWE  
2 externally, and now here I was raising my  
3 hand for another role and I was being  
4 denied the opportunity.

5 Q. Let me ask you the question  
6 more broadly.

7 What, if anything, leads you to  
8 believe that anything that has happened to  
9 you at Google is because of any complaints  
10 you have raised about discrimination?

11 A. Look, I think I raised a  
12 concern, and I raised a concern due to my  
13 gender and how I was treated, and then  
14 shortly after that I was demoted and all  
15 these things happened, so it was my natural  
16 conclusion.

17 Q. So other than the sequence of  
18 timing, is there anything else that leads  
19 you to believe that anything that happened  
20 to you at Google was because of your  
21 complaints of discrimination?

22 MS. GREENE: Objection.

23 A. Look, I don't know, you know, I  
24 don't know everything that happened. Like  
25 I am just sharing my experiences of what

1 | U. ROWE

2 happened.

3 Q. So, again, other than the  
4 sequence of timing, is there anything else  
5 that leads you to believe that anything  
6 that happened to you at Google was because  
7 of your complaints of discrimination?

8 MS. GREENE: Objection.

9 A. I think it's not just the  
10 sequence of events, but actually what  
11 happened as well.

12 Q. And the "what" is you say you  
13 were demoted, you say you were isolated,  
14 and you were denied this other job that was  
15 given to Yolande Piazza?

16 A. **Correct.**

17 Q. Those are the things that  
18 happened?

19 A. Correct.

20 Q. And my question to you is other  
21 than the sequence of timing between your  
22 complaints of discrimination and the timing  
23 of those things I just mentioned, other  
24 than the timing, is there anything else  
25 that leads you to believe that those events

1 U. ROWE

2 were because of your complaints of

3 discrimination?

4 MS. GREENE: Objection.

5 A. Again, it's not just the

6 timing, you know, I was isolated.

7 Q. Then what else is it?

8 A. Because like I was isolated

9 when my male peers were not isolated. When

10 they were given opportunities, I wasn't

11 given opportunities. So it is not just,

12 you know, the sequence of what happened,

13 but like what I experienced during that

14 time.

15 Q. So what you describe as

16 isolating, being isolated, what leads,

17 other than the sequence of timing, other

18 than those events occurring which you

19 already testified about today -- withdrawn.

20 Let me ask you more specifically.

21 When you say being isolated,

22 you are talking about your testimony about

23 not being invited to meetings, correct?

24 A. That's one of the things.

25 Q. Not being invited to client

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2 CERTIFICATION

3

4 I, TODD DeSIMONE, a Notary Public for  
5 and within the State of New York, do hereby  
6 certify:

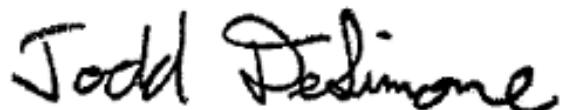
7 That the witness whose testimony as  
8 herein set forth, was duly sworn by me; and  
9 that the within transcript is a true record  
10 of the testimony given by said witness.

11 I further certify that I am not related  
12 to any of the parties to this action by  
13 blood or marriage, and that I am in no way  
14 interested in the outcome of this matter.

15 IN WITNESS WHEREOF, I have hereunto set  
16 my hand this 26th day of October, 2020.

17

18



19

TODD DESIMONE

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2  
ERRATA SHEET  
VERITEXT LEGAL SOLUTIONS

3

CASE NAME: ROWE v. GOOGLE  
DATE OF DEPOSITION: 10/14/20  
WITNESS' NAME: ULKU ROWE

5

## PAGE/LINE(S)/CHANGE/REASON

6

121:8 /change "lock" to "look"/spelling  
250:20/change "are" to "were"/correction  
254:9/delete "on"/ correction  
261:22/change "plus" to "plug"/spelling  
264:4/change "were" to "they were"/ correction  
286:14/change "was" to "were"/correction  
286:22/change "8's" to "8s"/spelling  
290:24/change "Weidman" to "Vardaman"/  
correction  
294:19/change "was" to "were"/correction

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11

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12

11/30/2020

13

Date -----

14

Ulku Rowe

DocuSigned by:  
Ulku Rowe  
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